

Name:  
Address:  
Telephone:

Kyron Palombi (Adam) #203712, 21860.

Kane County Penitentiary

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Pro Se Litigant

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U.S. DISTRICT COURT

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U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

CENTRAL DIVISION

DEPUTY CLERK

Kyron Palombi (Adam), #203712,  
#21860. Kane Co. Penitentiary

(Full Name)

PLAINTIFF

vs.

Nicole Rae, and

John Doe(s) 1-10

DEFENDANTS

CIVIL RIGHTS COMPLAINT

(42 U.S.C §1983, §1985)

Case: 2:15cv00025

Assigned To : Waddoups, Clark

Assign. Date : 1/12/2015

Description: Palombi v. Rae et al

A. JURISDICTION

1. Jurisdiction is proper in this court according to:

a. ☒ 42 U.S.C. §1983

b. ☒ 42 U.S.C. §1985

c. ☒ Other (Please Specify) United States Constitutional and  
statutory code.

2. NAME OF PLAINTIFF Kyron Palombi (Adam) #203712, 21860  
IS A CITIZEN OF THE STATE OF Utah

PRESENT MAILING ADDRESS:

Kane County Penitentiary

971 E Kaneplex Dr.

Kanab, UT 84741-5500

(435) 644-4914

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3. NAME OF FIRST DEFENDANT Nicole Rae  
IS A CITIZEN OF American Fork, Utah  
(City and State)

IS EMPLOYED AS Unknown at \_\_\_\_\_.  
(Position and Title if Any) (Organization)

Was the defendant acting under the authority or color of state law at the time these claims occurred?

YES \_\_\_ NO ☒. If your answer is "YES" briefly explain.

\* Nicole Rae, Courtney Rodriguez, Lillian Rae, and all the rest of the defendants can be found through detectives Christensen and Ludlow, who work at American Fork Police Dept.

51 East Main St.  
American Fork, UT 84003

4. NAME OF SECOND DEFENDANT Courtney Rodriguez  
(If applicable)

IS A CITIZEN OF American Fork, Utah  
(City and State)

IS EMPLOYED AS Unknown at \_\_\_\_\_.  
(Position and Title if Any) (Organization)

Was the defendant acting under the authority or color of state law at the time these claims occurred?

YES \_\_\_ NO ☒. If your answer is "YES" briefly explain.

5. NAME OF THIRD DEFENDANT Lillian Rae  
(If applicable)

IS A CITIZEN OF American Fork, Utah  
(City and State)

IS EMPLOYED AS Unknown Undefined at \_\_\_\_\_.  
(Position and Title if Any) (Organization)

Was the defendant acting under the authority or color of state law at the time these claims occurred?

YES \_\_\_ NO ☒. If your answer is "YES" briefly explain.

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6. NAME OF FOURTH DEFENDANT Det. Christensen  
(If applicable)

IS A CITIZEN OF American Fork, Utah  
(city and State)

IS EMPLOYED AS a Police Detective at American Fork Police Dept.  
(Position and Title if Any) (Organization)

Was the defendant acting under the authority or color of state law at the time these claims occurred?

YES ☒ NO \_\_\_. If your answer is "YES" briefly explain.

The Detective was acting under color of state law and abducted me, illegally arresting me w/out a valid warrant first being issued, w/out sufficient evidence to establish REASONABLE PROBABLE cause that a felony was committed, attempting to interrogate me w/out a lawyer present and refusing my right to call an attorney. (Additional sheets used, rest of defendant listed on following yellow sheets.)

(Use additional sheets of paper if necessary.)

**B. NATURE OF CASE**

1. Why are you bringing this case to court? Please explain the circumstances that led to the problem.

After Lillian Rae urged Nicole Rae to file a falsified report with AFPD that I "sexually abused" or "raped" her daughter, Dawna Whiting promulgated the false information to Detectives Christensen and Ludlow, who deprived me of my civil rights to Liberty and an attorney, and Abducted me without a warrant first legally being issued as defined by state, federal and constitutional law. Resulting in illegal incarceration, illegal prosecutions and convictions, being blocked from attorneys and law libraries, and being illegally deprived of my liberty.

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7. Defendant

Det. Ludlow

CITIZEN OF: American Fork, Utah

EMPLOYED AS: a Police Detective at American Fork Police Dept.

DEFENDANT ACTING UNDER COLOR OF LAW?

YES ✓

BRIEF EXPLANATION:

Det Ludlow was acting under the color of law when he received falsified and inconsistent information from Dawna Whiting, Victims Advocate, American Fork PD; Lillian Rae; Nicole Rae; and Courtney Rodriguez.

Det Ludlow assisted in the production of falsified records/statements, assisted in the transmission of said documents to the Provo 4th District court and Utah County District Attorney, and assisted/abetted Det. Christensen in the abduction and illegal arrest of myself, Denying me my rights to an attorney, without any warrants first being issued; without sufficient evidence to establish REASONABLE probable cause that a felony was committed.

8. Defendant

Victims Advocate, Dawna Whiting, AFPD

CITIZEN OF: American Fork, Utah

EMPLOYED AS: a victims advocate at American Fork Police Dept, which feeds "rape hotline" info to AFPD officers.

DEFENDANT ACTING UNDER COLOR OF LAW?

YES ✓

BRIEF EXPLANATION:

Dawna Whiting was acting under the color of

8.

Defendant

Victims Advocate, Dawna Whiting, AFPD [REDACTED]

BRIEF EXPLANATION (Cont.):

law when she took falsified and inconsistent statements and information and promulgated them to AFPD law enforcement knowingly and intentionally to have an unconstitutional and illegal arrest/abduction performed; aiding and abetting the illegal activities of AFPD's Detectives Christensen and Ludlow; committing official misconduct and aiding in the deprivation of the constitutional rights of the plaintiff through the malicious promotion of falsified "criminal" information and allegations, effectively libeling, slandering, and criminally defaming the character of the plaintiff.

9.

Defendant

American Fork Police Department; The city of American Fork. The Chief of Police for AFPD The state of Utah.

CITIZEN OF: American Fork, Utah

EMPLOYED AS: State operated police department, and incorporated municipality chartered by the State of Utah.

DEFENDANT ACTING UNDER COLOR OF LAW?

YES ✓

BRIEF EXPLANATION:

The City of American Fork and American Fork Police Dept (AFPD) under the command of the Chief of Police for AFPD, acting under color of law, is did knowingly and intentionally aid & abet the illegal, corrupt, and unconstitutional activities of the last three defendants listed, Dets. Christensen, Ludlow, and KA. Dawna Whiting.

### C. CAUSE OF ACTION

1. I allege that my constitutional rights, privileges or immunities have been violated and that the following facts form the basis for my allegations: (If necessary you may attach additional pages)

a. (1) Count I: \_\_\_\_\_

- (2) Supporting Facts: (Describe exactly what each defendant did or did not do. State the facts clearly in your own words without citing legal authority or arguments.)

★ All counts begin on the next page in the series of listed yellow pages. Please turn to the next page.



All TORTS suffered can be found starting at pg. 19.

b. (1) Count II: \_\_\_\_\_

- (2) Supporting Facts: \_\_\_\_\_

c. (1) Count III: \_\_\_\_\_

### C. CAUSE OF ACTION

- (1) Count I: Furnishing falsified & inconsistent statements to American Fork Police Department (AFFD); and I.2 to Provo's Fourth Judicial District Court.

Defendants in ~~the~~ violation:

1. Nicole Rae
2. Courtney Rodriguez
3. Lillian Rae
4. Dawna Whiting - AFFD's victim's advocate
5. AFFD's Detective Ludlow, ~~Co.~~ Detective Christensen.

#### (2) Supporting Facts:

- 1. Nicole Rae: After Lillian Rae, Nicole's mother, called the "rape hotline" she took Nicole Rae to the police department in American Fork (AFFD) and Nicole lied to the police saying I raped her, sodomized her; and sexually abused her on two separate occasions.

She provided false and inconsistent statements and facts to AFFD's Detectives Ludlow & Christensen who interviewed her following her contact from Dawna Whiting (who chose to promulgate the lies of Lillian Rae, ~~probably~~ <sup>likely</sup> ~~out of~~ <sup>maliciousness</sup> and spite towards males associated with ~~her~~ Lillian's daughter).

Dawna Whiting is the "victim's advocate" for AFFD.

- 2. Nicole Rodriguez: likewise also provided false & inconsistent statements to the detectives to "save her own skin", "get herself out of trouble" (or "perceived trouble"), and very likely "malice & spite", potentially from ~~her~~ jealousy, or out of spite in general.

She provided these false and inconsistent statements to the detectives at AFFD (Ludlow & Christensen).

- 3. Lillian Rae: like her daughter Nicole, and her ~~her~~ daughter's bestfriend Courtney Rodriguez, Lillian

## C. CAUSE OF ACTION (cont. pg 2)

Rae also provided false facts and inconsistent statements to Dawna Whiting - AFPD's VA, and AFPD's Detective Ludlow & Christensen.

She did this knowingly and intentionally lying to the police & the victim's advocate (VA).

- ▶ 4. Dawna Whiting - AFPD "victim's advocate": lied to AFPD police and aided & abetted the lies of Lillian Rae and her daughter Nicole Rae to the AFPD police. She provided falsified reports, and false statements & facts furnished to her by Lillian & Nicole Rae.
- ▶ 5. AFPD's Detective Ludlow: Detective Ludlow provided these false statements and facts in reports to the 4th Judicial District Court in Provo, UT. I was unlawfully prosecuted after being abducted, then illegally convicted without a fair, complete, and ~~thorough~~ thorough, effect criminal defense.
- ▶ 6. AFPD's Detective Christensen: in the exact same manner Det. ~~Ludlow~~ Ludlow, Det. Christensen also provided false and inconsistent statements to District Attorney (D.A. or DA.) David Sturgill and 4th ~~Judicial District Court~~ Judicial District Court, Provo, UT.

### (1) Count II: Slander

Defendants in violation:

1. Nicole Rae 2. Courtney Rodriguez 3. Lillian Rae
4. Dawna Whiting 5. Detective Ludlow - AFPD 6. Detective Christensen - AFPD.

### (2) Supporting Facts:

- ▶ 1. Nicole Rae: By lying to police - AFPD, Dawna Whiting - AFPD (the "rape" or "victim's" "advocate"), Detectives Ludlow and Christiansen - AFPD, her mother, to other people, and ultimately the courts; saying that I



### C. CAUSE OF ACTION (Cont. pg. 3)

raped, sodomized, forcefully sexually abused, and initiated, enticed, or coerced her to engage in sexual groping and the other sexual activities mentioned, Nicole Rae slandered me multiple times to multiple entities.

(x7 counts) • Dawna Whiting • Det. Ludlow • Det. Christensen  
• her mother • the DA • the court • Nicole's bishop - Mormonism

► 2. Courtney Rodriguez: Courtney in the same fashion as Nicole also slandered me.

(x6 counts) • Dawna • Ludlow • Christensen • Nicole's mother Lillian • the DA, David Sturgill • the court

► 3. Lillian Rae: Same reasons as Nicole & Courtney.  
(x5) • Dawna • Ludlow • Christensen • the DA, Sturgill • the court

► 4. Dawna Whiting: Slandered me in her false statements, reports, and conversations w/ AFD police officers and Det. Ludlow & Christensen.

(x4) • Ludlow • Christensen • DA, Sturgill • the court.

► 5. Det. Ludlow - AFD: Slandered me in the same methods as above defendants.

(x2) • Det. Christensen • the Court

► 6. Det. Christensen - AFD: Slandered me in the same fashion as all the other defendants.

(x2) • Det. Ludlow & office staff • the court

#### (1) Count III: Libel

Defendants in violation:

1. Nicole Rae      2. Courtney Rodriguez      3. Lillian Rae
4. Dawna Whiting      5. Det. Ludlow - AFD
6. Det. Christensen - AFD

## C. CAUSE OF ACTION (Cont. pg. 4)

### (2) Supporting facts:

- ▶ 1. Nicole Rae: committed libel by writing down her lies and inconsistent statements on paper and submitting them as legal, official, or formal documents to AAFP police & court.
- ▶ 2. Courtney Rodriguez: In the same manner as Nicole Courtney libeled me by writing down false and inconsistent statements of a falsified / or twisted sexually explicit nature.
- ▶ 3. Lillian Rae: in the same manner as Nicole and Courtney, Lillian libeled me when she wrote falsified and misconstrued statements of the issues that Nicole & Courtney lied about to Dawna Whiting, Det. Ludlow & Christensen, Investigators, and the court. (x6)
- ▶ 4. Dawna Whiting - AAFP, "Victims Advocate": lied to police and wrote down the the slanderous statements given to her by Lillian Rae, Nicole, & Courtney; and circulated them to AAFP's det. Ludlow, det. Christensen, investigators, the Board of Pardons <sup>(BOPP)</sup> and Parole, News agencies, and the court; including the DA, Sturgill. (x7)
- ▶ 5. Det. Ludlow - AAFP: libeled me by providing the false & inconsistent statements he made that reflected the false accusations of the women-defendants to the DA, the Court, investigators, and BOPP. (x4)
- ▶ 6. Det. Christensen - AAFP: libeled me in the same manner as det. Ludlow. (x4)

### (1) Count IV: Defamation of Character

Defendants in violation:

1. Nicole Rae    2. Courtney Rodriguez    3. Lillian Rae  
4, 5, & 6. Dawna Whiting and Det. Ludlow & Christensen - AAFP.

## C. CAUSE OF ACTION (Cont. pg. 5)

### (2) Supporting facts:

- 1. Nicole Rae: defamed my character because of her lies to police, slander, and libel. Because of her false & inconsistent statements furnished to AAFP's detectives I was illegally & unconstitutionally abducted and deprived of my liberty. I was unjustly incarcerated in violation of constitutional law, and suffered the following TORTS/INJURIES listed on PAGE(S) 19-20, TORTS /or INJURIES SUFFERED.

She defamed my character because of all the crimes she committed; destroying /misconstruing my reputation with law enforcement agencies, courts, the public, prison populations, news agencies, online, and my criminal record; as well as family members.

- 2. Courtney Rodriguez: by committing the crimes that she committed Courtney defamed my character and damaged my reputation. She deprived me unjustly of my liberty, aided in my illegal abduction, assisted in my unjust imprisonment against constitutional law, and caused me to suffer the TORTS listed on page(s) 19-20, TORTS /or INJURIES SUFFERED.

- 3. Lillian Rae: For the same reasons as Nicole & Courtney, Lillian defamed my character, destroyed my reputation, aided in my abduction & illegal imprisonment, caused my constitutional rights to be violated, and caused me to suffer the **TORTS** listed above, on page(s) 19-20.

- 4. Dawna Whiting: For all the same reasons as the other women Dawna defamed & destroyed my reputation and character for the lies she abetted and aided that Nicole & the others told. Because of this she is also responsible for all the **TORTS** I suffered which are attached on page(s) 19-20.

### C. CAUSE OF ACTION (Cont. pg. 6)

(1) Count V: Fraud by deception

Defendants in violation:

1. Lillian Rae

(2) Supporting facts:

► 1. Lillian Rae: Lillian committed 'fraud by deception' by abusing the legal system to get ~~free~~ "free therapy & counseling" for Nicole. She lied and said that Nicole had "PTSD" and "trauma", ~~and~~ never gave adequate symptoms, but rather the symptoms of an irresponsible young adult female.

She lied to the courts saying that, "Nicole has [psychological] issues now"; when she never had these issues before OR after our encounter.

Lillian did this to get money and free counseling for her irresponsible daughter at MY expense; trying to get me to pay through the 'Victims Advocate' at AFPD. She tried to capitalize off this opportunity when Nicole doesn't have any "trauma" or "mental disorders."

It was a LIE.

(1) Count VI: Aiding & abetting lies and false & inconsistent statements to AFPD police.

Defendants in violation:

1. Dawna Whiting - AFPD "victim's advocate".

(2) Supporting facts:

► 1. Dawna Whiting: by referring Lillian's, Nicole's, and Courtney's lies to AFPD detectives, Dawna Whiting aided & abetted these women's false & incons-

## C. CAUSE OF ACTION (Cont. pg. 7)

instant statements to police, then ultimately the court.  
(x 3 counts/instances) • Nicole • Lillian • Courtney  
This caused the **TORTS** listed on pages 19-20.

### (1) Count VII: Official Misconduct

Defendants in violation:

1. Dawna Whiting
2. Det. Ludlow
3. Det. Christensen

### (2) Supporting facts:

- 1. Dawna Whiting: For every TORT and crime, and constitutional violation that Dawna committed, she committed 'Official Misconduct', and is also guilty of official misconduct for the sole fact that she committed these violations, crimes, and torts.  
(x 5 counts)

- Lying & providing false & inconsistent statements to the AAFP police
- providing those false statements to the 4th judicial district court
- Aiding & abetting these women in their lies.
- Slandered me
- Libeled me ... etc.

- 2. Det. Ludlow - AAFP: For the same reasons as Dawna, Ludlow also committed 'official misconduct'.  
(x 7 counts) except

- promulgating the lies of these women.
- arresting me without a valid warrant first legally being issued.
- committing aggravated abduction / kidnapping by abducting me while in possession of weapons ... more [attach]

### C. CAUSE OF ACTION (Cont. pg 8)

- 3. Det. Christensen - AAFP: For all the same reasons as Ludlow, because Christensen committed all the same offenses / TORTS. (x 7 counts) ... more [attach]

- (1) Count VIII: Arrest without warrant first being legally issued: aggravated illegal arrest executed.

~~Defendants~~ in violation:

1. AAFP's Detective Ludlow      2. AAFP's Det. Christensen

- (2) Supporting facts:

- 1. Det. Ludlow - AAFP: Det. Ludlow along with Det. Christensen executed an unconstitutional arrest on me. Depriving me unjustly of my rights and liberty, source of income, financing for my criminal defense, all my possessions, two jobs, online & data accounts, access to my family, friends, support groups, and social network.

No warrants were legally issued validly by a Magistrate judge.

Neither he nor Det. Christensen had any substantial evidence to merit any REASONABLE PROBABLE ~~CAUSE~~ CAUSE that any felony or class A. misdemeanor crime had actually ever been committed.

These unconstitutional activities resulted in my unjustified and illegal loss and deprivation of my Constitutionally protected and ensured LIBERTY & RIGHTS as an American Citizen. It also caused all the **TORTS** listed on pg(s) 19-20, TORTS / or INJURIES SUFFERED.

### C. CAUSE OF ACTION (Cont. pg. 9)

- 2. Det. Christensen - AFD: Det. Christensen helped Ludlow deprive me of my liberty. In fact the facts on Det. Christensen in this regard are the same as Ludlow's, except that Christensen was the leading arresting officer. He was the one who performed the illegal arrest and abduction on me. Because of Christensen's unconstitutional actions I suffered the **TORTS** listed on pages 19-20.

- (1) Count IX: Aggravated abduction / Kidnapping  
Defendants in violation:  
1. Detective Ludlow - AFD 2. Det. Christensen - AFD.

(2) Supporting facts:

- 1. Det. Ludlow - AFD: without a warrant and in violation of state, federal, and Constitutional laws, Det. Ludlow assisted Det. Christensen in ABDUCTING me and falsely / illegally incarcerating me; while being in possession of deadly / dangerous weapons and abusing the power and position of his office. Because of ~~these~~ these actions I suffered the **TORTS** listed on pages 19-20.

The abduction occurred on Feb 2nd, 2010 (they say 2011) at the American Fork Police Department in American Fork, UT. This was after they deceived me and lured me from my place of residence at about 400 s 300 e, American Fork, UT.

- 2. Det. Christensen: For the same reasons that Ludlow abducted / kidnapped me, Christensen did also as they worked together. However Christensen is the principle officer who performed the abduction

### C. CAUSE OF ACTION (Cont. pg. 10)

in the interrogation room at AFD.

He tried to force me to talk and accuse myself of acts I had not committed that he was accusing me of. And he refused to allow me to have an attorney present during my questioning.

He cuffed me ~~up~~ illegally and abducted me, transferring me by driving me from AFD to Utah County Jail (UCJ) in his specialized custom undercover police squad car. UCJ held me in violation of statutory and constitutional law, and blocked me from communicating with lawyers and from law library, defense tools & resources, and from a Federally mandated effective, affirmative, complete, thorough & speedy defense by a properly qualified & experienced / seasoned attorney.

While enroute to UCJ he sneered at me and maliciously scoffed at me saying "you're going away for a very long time!" I asked him "How long did he think?" He said about 7, or 10 or more years.

Christensen said he was charging me with two 1<sup>st</sup> deg. felonies, one 2<sup>nd</sup> deg. felony, and one class A misdemeanor; for "raping Nicole Rae."

He committed all these heinous crimes while in possession of weapons and abusing his office. This abduction occurred at AFD in American Fork, UT on Feb 2<sup>nd</sup> 2010 (they say 2011).

\* Aiding & Abetting the corruption of ~~malfeasant~~ officers ...

(1) Count X, XI, and XII

Defendants in violation: 1. The Police Department of American Fork City 2. The Chief of Police, AFD

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## C. CAUSE OF ACTION (Cont. pg. 11)

### 3. The State of Utah.

... XI Aiding & Abetting illegal arrest and imprisonment.

XII Aiding & Abetting an aggravated abduction / kidnapping.

#### (2) Supporting facts:

► 1. All three defendants (AFPD, their police Chief, and the State of Utah; ~~Henceforth~~ referred to as AFPD & the State):  
Did violate my civil rights, committed the **TORTS** listed on pages 19-20, and violated statutory laws in the following ways.

o For Count X; Aiding & abetting corrupt officers ... :  
AFPD & the State assisted and supported detectives Ludlow & Christensen; and gave them power and resources. Also by keeping them employed and not preventing them from violating the Constitution of The United States of America, and committing state and Federal crimes.

o For Count XI; Aiding & abetting an illegal arrest ... :  
AFPD & the State aided ~~malfeasant~~ detectives Ludlow and Christensen, and abetted them, in the performing of an illegal arrest without a valid warrant first being lawfully issued. The illegal arrest was executed Feb 2<sup>nd</sup>, 2010 ("2011") at AFPD, American Fork, UT, by det. Christensen.

o For Count XII; Aiding & abetting an aggravated abduction ... :

AFPD & the State supported, aided, and abetted detectives Ludlow and Christensen in their abduction of me on Feb 2<sup>nd</sup>, 2011. The officers misconducted their and were in possession of weapons, especially firearms.

All these crimes / constitutional violations resulted in the **TORTS** that I suffered listed on pages 19-20, **TORTS / or INJURIES SUFFERED.**

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(2) Supporting Facts: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

#### D. INJURY

1. How have you been injured by the actions of the defendant(s)?

I have been injured in many various ways.

The main injuries here are being illegally deprived of my constitutional rights to freedom and liberty, access to the courts and attorneys, and law libraries, defense tools & resources, and an effective affirmative defense under federal law against criminal accusations.

All other **TORTS** stem from these which are listed on the next pages, pg(s). 19-20.

#### E. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF

1. Have you filed other lawsuits in state or federal court that deal with the same facts that are involved in this action or otherwise relate to the conditions of your imprisonment?  
YES \_\_\_\_\_ / NO ✓. If your answer is "YES," describe each lawsuit. (If there is more than one lawsuit, describe additional lawsuits on additional separate pages, using the same outline.)

- a. Parties to previous lawsuit:

Plaintiff(s): \_\_\_\_\_

Defendant(s): \_\_\_\_\_

- b. Name of court and case or docket number: \_\_\_\_\_



## TORTS /or INJURIES SUFFERED

I've been injured, or disenfranchised, because of the lies of Nicole Rae and her mother and friend, and Detectives Christensen and Ludlow, and Dawna Whiting the ~~Victims~~ Advocate at AFPD, and AFPD's malicious conduct in all of the following ways... including, but not limited to...

1. Being slandered: lied upon to not just the public, but a law enforcement agency.
2. I was libeled: These lies were written in falsified and inconsistent statements which were furnished to AFPD police, and which were publicized in a ~~new~~ news paper posting, The Provo Daily Herald. These lies were also submitted to 4th district court where I was illegally and unjustly prosecuted w/out sufficient evidence to establish reasonable probable cause that a crime had been committed (let alone a 3rd or misd A);
3. Defamation of character: My reputation and character was defamed and damaged because of these lies... and I was arrested illegally and without a warrant being first lawfully and legitimately issued.
4. Unjustified incarceration, unmerited imprisonment & financial charges. (violations of the law and Constitutional Rights)
5. Loss & theft of all possessions by police arrests and others acting as scavengers: Being unjustly deprived of Constitutionally protected property.
6. Illegal and unconstitutional treatment while incarcerated illegally.
7. Unlawful & unconstitutional loss & deprivation of property.
8. Mental, psycho-social and emotional damages due to constant causes of immense amounts of stress & anxiety.
9. I was unjustifiably publicly ridiculed.
10. Exposed to possible and actual engagement of fights, physical damages, wounds and injuries, mortal wounds, and death by various means.
11. Serious spinal & neck injuries from constant inadequate bedding throughout the Utah Prison System (USP).
12. Serious malnourishment (constant) (4+ years)
13. Constant deprivation of adequate access to ~~proper~~ proper fitness equipment for 4+ years.

## TORTS /or INJURIES SUFFERED (Cont. pg2)

14. Damaged fingers from perpetual writing and being blocked from adequate typing instruments for correspondence and legal casework which are vital and endless in the USP.
15. Psychological - emotional damages resulting in psychological - emotional disorders.
16. Socio-economic - financial devastation.
17. Loss of money
18. Loss of wages
19. Carpel tunnel damages
20. Damages to knees
21. Damages to eyes (flittering)
22. Damages sustained to my mother (dependance on me), and money lost by her; the stress, anxiety, worry, physical disorders caused by her constant worrying about me in prison.
23. Time and finances lost to Educational financing and defaulted loan issues.
24. Social misperceptions: public, in jails and prisons, and twisted through news media.
25. Personal misery & emotional stress & strain.
26. Loss of myriads of opportunities: financial, educational, occupational, social, personal.
27. Dental decay and loss of part or all of certain teeth; inadequate dental treatments and/or access to adequate cost-effective dental hygien supplies.
28. Constant <sup>heavy</sup> sleep deprivation & all the psycho-social-emotional disorders that follow it.
29. Being forced into unconstitutional slavery by IPP and USP
30. Blocked from equitable employment constantly by (IPP) and USP.
31. Being forced to be paid a despicable fraction of Federal Minimum wages for the very few and highly competitive jobs that IPP and USP ~~DO~~ offer (a violation of Federal employment law).

c. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) \_\_\_\_\_

d. Issues raised: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

e. When did you file the lawsuit? \_\_\_\_\_  
Date Month Year

f. When was it (will it be) decided? \_\_\_\_\_

2. Have you previously sought informal or formal relief from the appropriate administrative officials regarding the acts complained of in Part C? YES ☒ / NO ☐. If your answer is "YES" briefly describe how relief was sought and the results. If your answer is "NO" explain why administrative relief was not sought.

This is my first lawsuit. UCS blocked me from calling provo city police dept to file a complaint. Neither provo police dept. or DA. would accept my calls to file complaints and it would not be in state interest as they are the ones who illegally prosecuted me.

#### F. REQUEST FOR RELIEF

1. I believe that I am entitled to the following relief:

I believe that I'm entitled to the following relief:

1. To have public & court records corrected & amended properly
2. To have public reports made in all public media reporting agencies that covered my criminal case, and all other public media reporting agencies in surrounding regions; coverage that repairs my reputation.

➡ PLEASE CONTINUE on page(s) 22-24.

**F. REQUEST FOR RELIEF (Cont.)**

\* I addressed the Judicial district court of Utah County and UCS. I was given insufficient access to criminal defense tools.

and professionals (phone-calls to lawyers who could be retained).

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### F. REQUEST FOR RELIEF (Cont.)

3. professional spinal therapy financed.
4. Evidence from this civil action used in other cases.
5. Immediate release from prison.
6. Sufficiently positive public relations report (about the truth of <sup>my case</sup>)
7. Treatment for PTSD and anxiety because of prison life.  
Emotional / Psychotherapy.
8. Complete carpal tunnel & joint therapy.
9. I want my freedom back.
10. A ~~truth~~ report on the ~~truth~~ violation of my constitutional rights and the criminal acts of the defendants aired publicly weekly regularly for 5 years statewide & nationally.
11. I want them all punished criminally.
12. I want them to all be publically made examples of;  
I want Nicole Rae's lies reported publicly & over all forms of media, especially television news and radio; and for her to be publically humiliated: accurately.
13. Cognitive behavioural ~~therapy~~ and social therapy and reintegration into society.
14. reinstatement back into society.
15. Drug treatment.
16. All criminal records ~~corrected and amended completely~~, (regarding this case being discussed, case # Provo 4th District Court, #111400386, Judge David W. Mortensen).
17. A full public confession and apology for 5 years reported weekly on national and state news at prime-time for 10-25 mins.
18. I want her/their church wards exposed for the parts they played in gossip, rumors, lies, and malicious advice to each other. I want her church ward publically humiliated for their deceitfulness, dishonest deeds; and I want Nicole & her friends and family publically excommunicated.
19. Prison - time for all defendants involved in this case BEC-AUSE of the prison-time I was wrongfully forced to serve.
20. Prison - time for all defendants involved in this case BEC-AUSE of all the mistreatment I suffered at the hands of malicious correctional and police officers.
21. A book and publishing contract financed by the defendants detailing the criminal acts and constitutional violations

## F. REQUEST FOR RELIEF (Cont. pg 2)

21. (cont.) they committed against me to my choosing; accurate case information.
22. A website, YouTube channel, and other social media dedicated to this offense and detailing the same case information and topics. Including documentaries and interviews with major television ~~and~~ networks and talk shows.
23. Provisions for myself and my family for the next 200+ years.
24. Provisions for my mother and her family for the next 200+ years.
25. Payment for all the University education I missed since 2010, and all the financing required to finish my Triple Business degree to an MBA (x3) and higher, and my Triple Minor to PHD (x3) or higher.
26. Payment to have all my loans and federal educational funding rehabilitated; and all past due amounts and interest paid, esp. due to being blocked from being able to communicate with FAFSA while being stuck in jails & prisons, and ALL their subsidiaries. (REINSTATED LOANS)
27. Payment for my football career through University.
28. The payment of a sum of NO LESS THAN \$6,500,000.00 United States Dollars (USD) for the damages, misery, and suffering wrongfully incurred on myself, my family & friends, from EACH of the defendants primarily Nicole Rae, Lillian Rae, and Detective's Christensen. This is also for having the audacity to lie to law enforcement officials and a judicial district court about events, ~~and~~ items, and acts that didn't occur, and also contradicted the statements of others. To be paid within ~~the~~ a realistic amount of time to be determined (TBD).
29. Payment for all lost wages, benefits, therapies, legal costs, court costs since my arrest, copies, procurement of effective counsel & co-counsel, and all other prison and world expenses internal & external.
30. Compensation for all the lost time, money, health, happiness, peace of mind, and serenity of my mother because of this ordeal; and that of all my family, friends, and lovers.
31. Compensation for all my data & social-network accounts and websites I lost and all the data & info inside them I lost.

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## F. REQUEST FOR RELIEF (Cont. pg 3)

32. Payment ~~to~~ ~~to~~ to restore ALL possessions lost due to illegal abductions. Payment to have all said possessions recovered and replaced (to be listed).
33. Purchase of
- New house
  - An endless supply of high quality luxury wine.
  - State-of-the-art modern bed (TBD) (ex: Seely posturpedic, or other, etc.)
  - New cars (Mercedes, BMW, others, etc.)
  - New electronics (iPad, desktops, apple imacs, Android cellphones w/ verizon service, jawbone, DVD players, and others I lost ~~to~~, etc.)
  - New wardrobe & bedding.
  - Health & Life insurance plan paid for 200+ years including auto, home, etc. for me, and my mother and family, and all close friends affected because of my criminal case.
  - New surveillance & security systems.
  - Relocation to a new neighborhood.
  - Stalking injunctions imposed on defendants.
  - Police relocation & protection, witness/victim protection program.
34. Buy me a new professional custom skateboard \$250.00+ mid.
35. Buy me a brand new Les Paul Gipsen guitar w/ pick & high quality namebrand loud amp.
36. I want Judicial tracking & updates on identity & whereabouts on ALL defendants. (stalking injunctions placed and witness/victim protection programs by police).
37. I want ALL defendants to make public and broadcasted confessions and ~~admissions~~ to the truth.

I want the truth to be told.



**DECLARATION UNDER PENALTY OF PERJURY**

The undersigned declares under penalty of perjury that he/she is the plaintiff in the above action, that he/she has read the above complaint, and that the information contained therein is true and correct. 28 U.S.C. §1746; 18 U.S.C. §1621.

Executed at Kane Co. Prison Dec 28th 2014.  
(Location) (Date)

K. Palombi  
Signature

Kyron Palombi (Adam) #203712

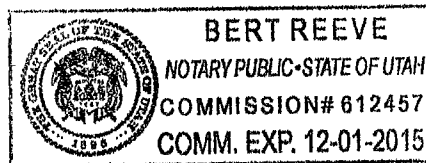
## Certificate of Acknowledgment

State of Utah

County of Kane

Before me, Bert Reeve, on this day personally appeared Adam Jason Palombi, known to me (or proved to me on the oath of \_\_\_\_\_ or through (description of identity card or other document)) to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that he executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office this 28 day of December, 2014.



Bert Reeve  
Notary Public's Signature

CERTIFICATE OF MAILING

I do hereby certify that a true and correct copy of the foregoing was mailed, postage pre-paid, to the Attorney General's Office, at 160 East 300 South, 6<sup>th</sup> Floor, Salt Lake City, Utah 84114, on this \_\_\_\_\_ day of \_\_\_\_\_, 2014.

\_\_\_\_\_

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